

Message

From: Valentine, Greg [valentine.greg@epa.gov]
Sent: 6/19/2013 1:45:53 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]
CC: Lutz, Craig [Lutz.Craig@epa.gov]
Subject: ITC 114 Information Request
Attachments: Intercontinental Terminals post inspection 114 Enclosure draft 6 7 2013.docx

Dan,

I added the date of our onsite IR camera survey (May 1st) and reviewed the whole 114, looks good. Sorry it took me so long. I've attached the updated 114. Let me know if you need anything else.

Greg Valentine
Environmental Scientist - Toxics Section

U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202
Mail Code: 6EN-AT

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ENCLOSURE
INFORMATION REQUEST
for
INTERCONTINENTAL TERMINALS COMPANY LLC (ITC)
PART 1 OF 4
AUTHORITY, INSTRUCTIONS, & DEFINITIONS

AUTHORITY

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information to Intercontinental Terminals Company LLC (ITC) to provide certain information regarding their Deer Park Terminal, pursuant to Section 114(a) of the Clean Air Act (“the Act” or “CAA”), 42 U.S.C. § 7414(a), for the purpose of determining compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of this information. The Administrator has delegated this authority to the Director of the Enforcement Division, EPA Region 6. Therefore, you are hereby required to provide responses to the questions and requested information regarding the ITC’s Deer Park Terminal located in Deer Park, Texas, as identified in **PART 2** of this Enclosure.

EPA requires ITC to submit the information requested no later than thirty (30) calendar days after your receipt of this letter. If information or documents not known or not available to you as of the date of submission of a response to this information request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please be advised that failure to provide the information required by this letter in a timely manner and in accordance with this information request may result in the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b). In addition, Section 113(c) of the Act provides criminal penalties for knowingly making any false statements or omission in any response required under the Act. EPA may also seek criminal penalties from any person who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of EPA or in relation to or contemplation of any such matter or case. *See* 18 U.S.C. §§ 1001, 1341, 1519.

ITC INFORMATION REQUEST

PART 1: AUTHORITY, INSTRUCTIONS, & DEFINITIONS

Any information that you provide in response to our request may be used in administrative, civil, and criminal proceedings. Therefore, a duly authorized officer or agent of ITC should certify your response to this information request by signing the enclosed Statement of Certification, provided in **PART 3**, and returning it with your response. For claiming any information you provide as confidential business information, please see **PART 4**.

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) who provided information that was used or considered in responding to that question, as well as each person who was consulted in the preparation of that response.
3. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which the document corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.
6. When specific questions request data in electronic form to be provided, the data and corresponding information should be provided in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
7. You have the option to provide any individual document that would otherwise be provided in hard copy form in response to our request for information in Portable Document Format (PDF), saved to a compact disc, rather than hard copy.
 - a. Each document provided in PDF must still be provided in accordance with those instructions for submittal of documents as outlined above (e.g., each PDF document should include all enclosures/attachments associated with the document, or a reference page added to indicate that a separate PDF document

ITC INFORMATION REQUEST

PART 1: AUTHORITY, INSTRUCTIONS, & DEFINITIONS

- is provided as the enclosure/attachment so referenced).
- b. For each compact disc containing PDF documents submitted in response to our request, a table of contents for the PDF documents on individual or multiple discs must be provided so that each PDF document can be accurately identified in relation to your response to a specific question. In addition, each compact disc should be labeled appropriately (e.g., Disc 1 of 4 for Information Request Response, Date of ITC Response). This option does not include any "data" specifically covered in item 6 of these instructions, above.
 - c. For PDF submittals please ensure that confidential business information and non-confidential information are submitted on separate disks. Please also mark each page that is confidential business information as such.

DEFINITIONS

All terms used in this information request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401, 40 C.F.R. Part 52 (which incorporates the Federally-approved State Implementation Plan), other CAA implementing regulations, or otherwise defined herein.

1. The term "Air Pollution Control Equipment" or "APCE" shall mean any control device and/or equipment used to reduce the release of particulate matter and other pollutants to the atmosphere.
2. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including documentation solely in electronic form, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, email, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or

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PART 1: AUTHORITY, INSTRUCTIONS, & DEFINITIONS

enclosures with any document, and (e) every document referred to in any other document.

3. The term “Emissions Unit” shall have the same meaning as defined at 40 C.F.R. §52.21(b)(7).
4. The terms “person” or “persons” shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.
5. The term “ITC” includes any officer, director, agent, or employee of ITC, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
6. The terms “you” or “yours”, as used in each of the questions set forth in the attached Section 114 letter, refers to, and shall mean, the company or corporation with which each addressee of the attached Section 114 letter is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.
7. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

ENCLOSURE
INFORMATION REQUEST
for
INTERCONTINENTAL TERMINALS COMPANY LLC (ITC)

PART 2 OF 4
QUESTIONS AND INFORMATION SPECIFIC TO
INTERCONTINENTAL TERMINALS DEER PARK TERMINAL

In accordance with that authority outlined in Enclosure, Part 1, this information request pertains specifically to ITC's Deer Park Terminal, located in Deer Park, Texas:

INTERCONTINENTAL TERMINALS DEER PARK TERMINAL

Latitude 29° 44' 06'', Longitude 095° 05' 47''

Physical location: 1943 Battleground Road

Nearest City: Deer Park

County: Harris

State/Zip Code: TX/ 77571

The Intercontinental Terminals Deer Park Terminal ("Facility") contains emission units that emit or have the potential to emit pollutants subject to requirements of the Prevention of Significant Deterioration (PSD) and/or New Source Review (NSR) programs and is subject to the requirements of Title V of the Clean Air Act (CAA). ITC must [SEQ CHAPTER \h \r 1]provide the following information for the Deer Park Terminal:

1. ITC previously provided true vapor pressure records to EPA by letter dated October 6, 2012. The true vapor pressure records provided indicate that for certain materials, the vapor pressure was determined using AP-42. Provide all associated calculation information that was used for the AP-42 maximum true vapor pressure determinations for:
 - a. Pyrolysis Gasoline that was in Tank 80-20 on October 19, 2012
 - b. Methanol that was in Tank 80-25 on October 19, 2012
 - c. Pyrolysis Gasoline that was in Tank 80-7 on October 19, 2012
 - d. Ethanol that was in Tank 80-2 on October 19, 2012
2. Provide with the calculation information, specific references identifying sources of information or data and calculation methodologies that were used, test methods used, and numerical values used for assumptions and calculation inputs, including composition data, temperature, molecular weights, and calculation constants. Also provide an example calculation for each different type of calculation.
3. Provide records of maximum true vapor pressure at actual storage temperatures for the Pyrolysis Gasoline stored in Tanks 80-15 on May 1, 2013. Provide the associated basis

ITC INFORMATION REQUEST

PART 2: QUESTIONS

information for the true vapor pressure records provided. Provide with the basis information, specific references identifying sources of information or data and calculation methodologies that were used, test methods used, and numerical values used for assumptions and calculation inputs, including composition data, temperature, molecular weights, and calculation constants. Also provide an example calculation for each different type of calculation.

4. Provide a copy of the most recent API 653 inspection report for Tank 80-15.
5. Provide a copy of the most recent internal (out of service) seal inspection report for Tank 80-15.
6. Provide a copy of the most recent through the hatch (external) seal inspection report for Tank 80-15.
7. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings associated with the most recent API 653 inspection, most recent internal (out of service) seal inspection and most recent through the hatch (external) seal inspection for Tank 80-15.
8. Provide a copy of all through the hatch (external) seal inspection reports for inspections of Tank 80-7 that have occurred since August 15, 2012, if there have been any.
9. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings, including but not limited to, liquid accumulation around the gauge well, associated with the August 15, 2012 through the hatch (external) seal inspection, and any subsequent through the hatch (external) seal inspections of Tank 80-7.
10. Provide a copy of all API 653 inspection reports for inspections of Tank 80-7 that have occurred since February 16, 2010, if there have been any.
11. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address the findings associated with the February 16, 2010 API 653 inspection, and any subsequent API 653 inspections, of Tank 80-7, including:
 - a. Shell deformation of Tank 80-7 located in Courses 4 and 5 from Stations 158.0 to 167.0, in Courses 5 and 6 from Stations 277.0 to 285.0 and in Courses 4 and 5 from Stations 337.0 to 346.0 (measured in feet counterclockwise from Manway A), and any consideration that has been given to evaluate the effects of this deformation on the operation of the floating roof;

ITC INFORMATION REQUEST

PART 2: QUESTIONS

- b. Damage/deterioration of the floating roof vertical ladder well cover plate and vapor seal of Tank 80-7; and,
 - c. The condition of the floating roof aluminum deck sheeting near the vertical ladder well of Tank 80-7.
- 12. Provide a copy of the most recent internal (out of service) seal inspection report for Tank 80-7.
- 13. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings associated with the most recent internal (out of service) seal inspection of Tank 80-7.
- 14. Provide a copy of all API 653 inspection reports for inspections of Tank 80-2 that have occurred since August 10, 2010, if there have been any.
- 15. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address the findings associated with the August 10, 2010 API 653 inspection, and any subsequent API 653 inspections, of Tank 80-2. Include internal documents and emails regarding the shell deformation of Tank 80-2 located at Station 197.5, between shell Courses 5 and 6, and at Station 189.5 between shell Courses 4 and 5, and internal documents and emails that consider or evaluate the effects of this deformation on the operation of the floating roof.
- 16. Provide a copy of all through the hatch (external) seal inspection reports for inspections of Tank 80-2 that have occurred since August 13, 2012, if there have been any.
- 17. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings, if any, associated with the most recent through the hatch (external) seal inspection of Tank 80-2.
- 18. Provide a copy of the most recent internal (out of service) seal inspection report for Tank 80-2.
- 19. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings associated with the most recent internal (out of service) seal inspection of Tank 80-2.
- 20. Provide a copy of all through the hatch (external) seal inspection reports for inspections of Tank 80-20 that have occurred since September 13, 2012, if there have been any.
- 21. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings associated with the September 13, 2012

ITC INFORMATION REQUEST

PART 2: QUESTIONS

- through the hatch (external) seal inspection, and any subsequent through the hatch (external) seal inspections, of Tank 80-20, including the ½ inch by 12 foot gap identified at the secondary seal.
22. Provide a copy of all API 653 inspection reports for inspections of Tank 80-20 since July 19, 2011, if there have been any.
 23. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address the findings associated with any API 653 inspections of Tank 80-20 that occurred after July 19, 2011, if any.
 24. Provide a copy of the most recent internal (out of service) seal inspection report for Tank 80-20.
 25. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings associated with the most recent internal (out of service) seal inspection of Tank 80-20.
 26. Provide a copy of all through the hatch (external) seal inspection reports for inspections of Tank 80-25 that have occurred since October 15, 2012, if there have been any.
 27. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings, if any, associated with the most recent through the hatch (external) seal inspection of Tank 80-25.
 28. Provide a copy of all API 653 inspection reports for inspections of Tank 80-25 that have occurred since March 20, 2012, if there have been any.
 29. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address the findings associated with the March 20, 2012 API 653 inspection, and any subsequent API 653 inspections, of Tank 80-25. Include internal documents and emails regarding the aluminum pontoons that were found to have deterioration and etching present on the lower half that was in contact with the product, the three holes that were found in the floating roof panels, and the small amount of sag that was noted for the floating roof panels.
 30. Provide a copy of the most recent internal (out of service) seal inspection report for Tank 80-25 that have occurred since May 25, 2012, if there have been any.
 31. Provide a copy of all internal documents and emails regarding corrective actions, costs and alternatives to address findings, if any, associated with the most recent internal (out of service) seal inspection report for Tank 80-25.

ITC INFORMATION REQUEST

PART 2: QUESTIONS

32. Provide a table identifying each permit application and permit by rule (PBR) registration representation since January 1, 1995 for emissions quantities, storage scenarios (identifying the allowable tank types and maximum number of each tank type by size), and physical and chemical characteristics of the emissions and stored material (including composition, density, molecular weight, temperature and vapor pressure), for storage tanks containing:

- a. Fuel Oil Blendstock;
- b. Ethanol 190-192.5 Proof;
- c. Pyrolysis Gasoline;
- d. No. 6 Fuel Oil, and;
- e. Methanol.

Include in the table the submittal date of each permit application and PBR registration representation, the associated permit and PBR registration numbers, and the project number assigned by the Texas Commission on Environmental Quality (TCEQ) for the application or registration review.

33. Provide a copy of each permit application and permit by rule (PBR) registration identified in response to question # 32, which was not provided in response to the CAA Section 114 Information Request dated August 24, 2012, issued to ITC.
34. Provide a copy of all sample analysis results for composition, density, molecular weight, and vapor pressure of stored Fuel Oil Blendstock, Pyrolysis Gasoline, and No. 6 Fuel Oil, for samples collected at the Facility and analyzed since August 22, 2003.
35. Provide recalculated emissions representations for Fuel Oil Blendstock, Pyrolysis Gasoline, and No. 6 Fuel Oil, including maximum hourly standing emissions, maximum hourly working emissions, and maximum annual emissions, if sample analysis results provided in response to question #34 differ from any currently applicable permit application or PBR registration composition, density, molecular weight, or vapor pressure representations identified in response to question #32, for samples collected at the Facility and analyzed since August 22, 2003.

ENCLOSURE
INFORMATION REQUEST
for
INTERCONTINENTAL TERMINALS COMPANY LLC (ITC)

PART 3 OF 4
STATEMENT OF CERTIFICATION FORM
FOR DULY AUTHORIZED AGENT
[SEQ CHAPTER \h \r 1]

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Title)

(Date)

ENCLOSURE
INFORMATION REQUEST
for
INTERCONTINENTAL TERMINALS COMPANY LLC (ITC)

PART 4 OF 4
CONFIDENTIAL BUSINESS INFORMATION (CBI)
CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in response to this information request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is desired up until a certain date or until the occurrence of a certain event, the notice should state this. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B.

Substantiation Requirements

All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business’s competitive edge.

ITC INFORMATION REQUEST

PART 4: CBI CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Pursuant to 40 C.F.R. Part 2, subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible, in accordance with 40 C.F.R. 2.204(e):

1. What specific portions of the information do you allege to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

ITC INFORMATION REQUEST

PART 4: CBI CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. "Emission data" means, with reference to any source of emission of any substance into the air:

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

(C) A general description of the location and nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Please also note that broad, non-specific CBI claims will likely result in an immediate request from EPA for substantiation.

Mr. Carl Holley
VP, Safety, Health & Environmental Security & Regulatory Compliance
Intercontinental Terminals Company, LLC
1943 Independence Parkway South
Deer Park, TX 77536

Re: EPA Onsite Infrared Camera Survey Videos

Dear Mr. Holley:

Included in this package please find a DVD-R with the infrared videos (MOV_0111 through MOV_0116) that were recorded during our May 1, 2013, site visit at your facility. MOV_0111 shows emissions from vents on Tank 80-9 which contained No. 6 Oil; MOV_0112 shows emissions from vents on Tank 80-12 which also contained No. 6 Oil; MOV_0113 shows emissions from vents on Tank 80-15 which contained pygas; MOV_0114 shows emissions from vents on Tank 80-7 which also contained pygas; MOV_0115 shows emissions from vents on Tank 80-9 (from a different angle than MOV_0111); and MOV_0116 shows emissions from vents on Tank 80-2 which contained ethyl alcohol (ethanol).

Should you have any questions or have any issues viewing the videos, please feel free to contact me at [[HYPERLINK "mailto:valentine.greg@epa.gov"](mailto:valentine.greg@epa.gov)] or (214) 665-3111.

Thanks for your assistance while we were onsite,

Greg Valentine
Enforcement Officer

Message

From: Hoyt, Daniel [Hoyt.Daniel@epa.gov]
Sent: 11/15/2013 5:55:38 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Secrest, Cary [Secrest.Cary@epa.gov]; Lutz, Craig [Lutz.Craig@epa.gov]
CC: Tate, Samuel [Tate.Samuel@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]
Subject: RE: PowerPoint draft for ITC meeting
Attachments: ITC presentation for 11 19 dh draft 11 15 2013.pptx

Here's the updated presentation for the ITC meeting.

Daniel Hoyt
Environmental Engineer
Air Surveillance Section
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From: Hoyt, Daniel
Sent: Friday, November 08, 2013 9:03 AM
To: Barnett, Cheryl; Secrest, Cary; Lutz, Craig
Cc: Tate, Samuel; Thompson, Steve; Welton, Patricia
Subject: PowerPoint draft for ITC meeting

This is a draft of the PowerPoint for the 11/19/13 meeting with ITC. I plan to run through it during our EPA-only meeting on Tuesday, 11/12/13 at 10 am.

I may receive updated graphics for the April/May 2013 mobile benzene screening from NEIC before the 11/17/13 meeting.

Daniel Hoyt
Environmental Engineer
Air Surveillance Section
US EPA, Region 6 (6EN-AS)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Phone: 214.665.7326
Fax: 214.665.3177 (call before faxing)

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Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 3/14/2013 2:35:08 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]
Subject: Comments on your inspection report
Attachments: ITC CAA Inspection Report draft MO edits 3-14-13.docx

Hi Dan:

Attached please find my edits for your inspection report. I just used "track changes." Let me know if you'd like to discuss them.

Thanks,
Margaret

Margaret Osbourne
Environmental Scientist
Compliance Assurance & Enforcement Division
EPA Region 6
1445 Ross Avenue (6EN-AS)
Dallas, TX 75202
214-665-6508

Confidentiality Warning:

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Message

From: Hoyt, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=831360B6376C4C2E9C05A7DA32DCB2F6-HOYT, DANIEL]
Sent: 6/7/2013 7:09:27 PM
To: Lutz, Craig [lutz.craig@epa.gov]; Valentine, Greg [valentine.greg@epa.gov]
CC: Tate, Samuel [Tate.Samuel@epa.gov]
Subject: ITC 114
Attachments: Intercontinental Terminals post inspection 114 Enclosure draft 6 7 2013.docx; Intercontinental Terminals post inspection 114 Cover Letter draft 6 7 2013.doc

Greg and Craig,

Here is the draft ITC 114 we previously discussed. Please take a look. I need to make sure all the tanks you identified with the IR camera are included, and I also need the specific date of your IR camera imaging (you'll see, in question #3 where I inserted a comment and left some blank space). Additionally, please let me know if you see anything that should be revised. I'll work with Sam next week to get an attorney assigned.

Thanks,

Dan

Daniel Hoyt
Environmental Engineer
Air Surveillance Section
US EPA, Region 6 (6EN-AS)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Phone: 214.665.7326
Fax: 214.665.3177 (call before faxing)

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED:

Carl Holley, VP, Safety, Health, and Environmental and Regulatory Compliance
Intercontinental Terminals Company LLC
P.O. Box 698
Deer Park, Texas 77536-0698

Re: 114 Information Request
Intercontinental Terminals Company LLC, Deer Park, Texas Terminal

Dear Mr. Holley:

Enclosed is an Information Request (Request) issued to Intercontinental Terminals Company LLC (ITC) under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine whether ITC's Deer Park, Texas Terminal is in compliance with provisions of the CAA. The Request contains detailed instructions, specific questions, and other relevant material for your use in responding to the Request.

Please provide the information within thirty (30) days of receipt of this letter to Mr. Daniel Hoyt (6EN-AS) at the above address. If you need additional time, EPA may grant an extension for cause, upon written request.

If you have any questions regarding the Request, please feel free to contact Mr. Hoyt, of my staff, at (214) 665-7326.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc: Ashley K. Wadick
Texas Commission on Environmental Quality, Region 12

Michael De La Cruz
Texas Commission on Environmental Quality

Message

From: Hoyt, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=831360B6376C4C2E9C05A7DA32DCB2F6-HOYT, DANIEL]
Sent: 1/29/2013 8:51:22 PM
To: Ford, Debbie [Ford.Debbie@epa.gov]
Subject: ITC Draft Inspection Report
Attachments: ITC CAA Inspection Report draft 1 10 13 - DH.docx; Master Log of Data ITC.xlsx

Debbie,

Here is the ITC draft inspection report and Master Log. Please review and provide feedback.

Thanks,

Dan



ITC CAA
Inspection Repor...



Master Log of Data
ITC.xlsx

Daniel Hoyt
Environmental Engineer
Air Surveillance Section
US EPA, Region 6, 6EN-AS
1445 Ross Avenue
Dallas, TX 75202-2733
Phone: 214.665.7326
Fax: 214.665.3177

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Message

From: Hoyt, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=831360B6376C4C2E9C05A7DA32DCB2F6-HOYT, DANIEL]
Sent: 4/11/2013 6:34:40 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: ITC Report
Attachments: ITC CAA Inspection Report final DH edits 3 21 13.docx

Daniel Hoyt
Environmental Engineer
Air Surveillance Section
US EPA, Region 6, 6EN-AS
1445 Ross Avenue
Dallas, TX 75202-2733
Phone: 214.665.7326
Fax: 214.665.3177

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Message

From: Hoyt, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=831360B6376C4C2E9C05A7DA32DCB2F6-HOYT, DANIEL]
Sent: 3/8/2013 3:21:37 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Inspection report
Attachments: ITC CAA Inspection Report draft DH edit 3 8 13.docx

Hello Margaret,

Please let me know how you think this looks now, and if you think anything else needs to be changed. I appreciate your help.

Thanks,

Dan

From: Osbourne, Margaret
Sent: Tuesday, March 05, 2013 12:09 PM
To: Hoyt, Daniel
Subject: Inspection report

Hi Dan:

Here is the report with my suggestions. I've also attached the template.

Thanks,
Margaret

Message

From: Hoyt, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=831360B6376C4C2E9C05A7DA32DCB2F6-HOYT, DANIEL]
Sent: 2/26/2013 8:27:59 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Inspection Report for Peer review
Attachments: ITC CAA Inspection Report draft 2 26 13 - DH.docx; Master Log of Data ITC.xlsx



ITC CAA
Inspection Repor...



Master Log of Data
ITC.xlsx

Thanks!

Dan



EPA REGION 6 AIR INSPECTION REPORT

FRS #: 110000504268 Inspection Dates: **October 10-12, 2012**
AFS #: 48-201-00153
Type of inspection: Clean Air Act, Partial Compliance Evaluation
Company Name: **INTERCONTINENTAL TERMINALS COMPANY LLC**
Facility Name: **INTERCONTINENTAL TERMINALS DEER PARK TERMINAL**
Physical Location: 1943 Independence Parkway South (also known as Battleground Road)
Deer Park, Texas 77536
Mailing Address: P.O. Box 698
Deer Park, Texas 77536-0698
County/Parish: **Harris County**
Reg. Programs: **SIP, Title V, MACT, NESHAP, and NSPS**
SIC Code: 4226 and 4953

Sam T. [Signature]
3/27/2013

Facility Representatives:

| | | |
|-------------------|--|--------------|
| Michael J. Gaudet | Environmental Compliance Manager | 281-884-0360 |
| Carl Holley | VP, Safety, Health, & Environmental Security & Regulatory Compliance | 281-884-0350 |
| Mike Vanegas | Safety Specialist | 281-884-0354 |
| Bob Pennacchi, PE | Sr. VP Operations | 281-884-0239 |
| Mark Jeansonne | Chief Financial Officer | 281-884-0312 |

EPA Inspectors:

| | | | |
|--------------|---------|----------------|--------------|
| Daniel Hoyt | 6EN-AS | Env. Engineer | 214-665-7326 |
| Cary Secrest | HQ-OECA | Env. Scientist | 202-564-8661 |

Enforcement Officer:

Daniel Hoyt

3/21/13

Daniel Hoyt, Environmental Engineer

(Date)

EPA Inspector:

Daniel Hoyt

3/21/13

Daniel Hoyt, Environmental Engineer

(Date)

Reviewed By:

Margaret Osbourne

3/21/13

Margaret Osbourne, Environmental Scientist

(Date)

Executive Summary:

This inspection report is comprised of four sections:

- **Section I – Introduction** includes the following topics:
 - purpose of the inspection,
 - facility description,
 - maps of the facility and detailed process descriptions (These are referenced in designated ATTACHMENTS.)
- **Section II – Observations**
- **Section III - Areas of Concern.** The issues stated in Section III in this report were identified during the time of this inspection and do not preclude any further enforcement document review, legal review or further enforcement action.

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

The inspection team, including me, EPA Region 6 inspector Daniel Hoyt, and EPA Office of Enforcement and Compliance Assistance, Air Enforcement Division inspector Cary Secrest, arrived at the Intercontinental Terminals Company LLC, Deer Park Terminal (ITC Deer Park) at 9:50 am on October 10, 2012, for an unannounced inspection. We met with Michael J. Gaudet, the environmental compliance manager. Cary Secrest presented his credentials, and I presented my EPA identification. Cary Secrest informed Mr. Gaudet that this was an EPA inspection to determine compliance with the Clean Air Act (CAA), and that the scope of the inspection, a partial compliance evaluation (PCE), included evaluation of the compliance of the facility with applicable CAA regulations, including Title V operating permit requirements and Texas State Implementation Plan (SIP) regulations. The objective was to systematically evaluate storage tanks, especially internal floating roof (IFR) tanks, and other sources, using an infrared (IR) camera for optical gas imaging and photo-ionization detectors (PID), detecting and identifying emissions sources for further investigation. The inspection was prompted by an analysis of stationary air monitoring data that I conducted, which indicated a significant air emissions source of benzene was located at or near the ITC Deer Park facility.

During the entry meeting, Mr. Gaudet provided us with a tank inventory list (see Attachment 1) and plot plans (see Attachment 2). Cary Secrest informed Mr. Gaudet that if any documents provided during the inspection contain confidential business information (CBI), those documents should be marked as confidential. We watched a safety video and were introduced to Mike Vanegas, who was identified as our primary escort for the field portion of the inspection.

FACILITY DESCRIPTION

The ITC Deer Park facility is a for-hire bulk liquid storage terminal. The site was originally constructed in 1971 and currently consists of 231 large aboveground storage tanks, tank truck and railcar transfer racks, docks and associated control devices (flares and thermal oxidizers). Products stored and transferred at the facility include chemicals, petrochemicals, oils, liquefied petroleum gas (LPG), and petroleum-derived liquid products. Products are transferred into and

out of the tanks via all modes of transportation including tank trucks, railcars, barges, ships and pipelines. A detailed process description and process flow diagrams are included with Attachment 4 (ITC Deer Park CAA Section 114 information request response). The ITC Deer Park facility operates 24 hours per day and currently employs 220 full time employees. Intercontinental Terminals Company LLC is a subsidiary of Mitsui & Co. (USA), Inc. according to the Mitsui website (www.mitsui.com/us/en/business/1197064_3596.html).

Section II – OBSERVATIONS

Cary Secrest used an optical gas imaging IR camera to survey volatile organic compounds (VOC) emissions sources, primarily tanks, at ITC Deer Park. Cary Secrest conducted IR camera surveys first in high sensitivity mode (HSM) for screening purposes, and then in full automatic mode (auto). Cary Secrest identified for follow up tanks with VOC emissions that were visible using the IR camera in both HSM and auto modes. I used two photo-ionization detectors to detect, verify and evaluate VOC emissions sources. One PID (Tiger) was equipped with a 10.6 eV lamp, and was calibrated with isobutylene. The other PID (Tiger Select) was equipped with a 10.0 eV glass filter that reduces the lamp output to 10.0 eV. The Tiger Select PID can be operated with a pre-filter tube to detect benzene-specific emissions, and was calibrated with benzene.

Video and image files referenced below, a spreadsheet file with all PID data collected during the inspection (ITC PID Master File 10 15 to 10 19 2012), and a summary spreadsheet file (Master Log of Data ITC) are included on a compact disk as Attachment 6. Attachment 7 presents the one photo that was taken during the inspection. An equipment list is included as Attachment 8, which identifies the equipment used by serial number. The PID calibration records, for the most recent calibrations prior to the inspection, as well as the records for the post-inspection calibration checks, are included as Attachment 9.

Cary Secrest and I selected the largest IRF tanks for the PID/IR camera survey. We surveyed 20 tanks on October 10, 2012, 39 tanks on October 11, 2012, and 39 tanks plus two flares on October 12, 2012. The following table lists the tanks that were observed that had IR camera visible emissions in HSM and auto modes, which is an indication of a potential problem with the tanks:

| Tank | Date, Time of Observation (Video File Name) | Fixed Roof or IFR Seal Type | Contents (True VOC Vapor Pressure) | Capacity (Barrels) | Year of Construction |
|------|--|-----------------------------------|---|--------------------|----------------------|
| 60-3 | 10/10/12, 15:13 (MOV_0424) | Fixed Roof | Fuel Oil Blend Stock (0.2 psi @ 130F) | 60,000 | 1992 |
| 80-2 | 10/10/12, 15:39 (MOV_0426) | Mechanical shoe w/secondary wiper | Ethanol, 190-192.5 Proof (1.48 psi @ 80F) | 80,000 | 1976 |

Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – SECTION II

| Tank | Date, Time of Observation (Video File Name) | Fixed Roof or IFR Seal Type | Contents (True VOC Vapor Pressure) | Capacity (Barrels) | Year of Construction |
|-------|---|-----------------------------------|--|--------------------|----------------------|
| 80-7 | 10/10/12, 16:06 (MOV_0431) | Double wiper – vapor mounted | Pyrolysis Gasoline (3.60 psi @ 80F) | 80,000 | 1977 |
| 80-9 | 10/10/12, 16:00 (MOV_430) | Fixed Roof | No. 6 Fuel Oil (0.32 psi @ 130F) | 80,000 | 1977 |
| 80-12 | 10/11/12, 9:44 (MOV_0433) and 9:47 (MOV_0434) | Fixed Roof | No. 6 Fuel Oil (0.21 psi @ 116F) | 80,000 | 1977 |
| 80-20 | 10/10/12, 14:41 (MOV_0423) | Mechanical shoe w/secondary wiper | Pyrolysis Gasoline (5.8 psi @ 80F) | 80,000 | 1979 |
| 80-25 | 10/11/12, 11:21 (MOV_0435) and 11:34 (MOV_0436) | Mechanical shoe w/secondary wiper | Methanol (2.75 psi @ 80F) | 80,000 | 1991 |
| 160-1 | 10/12/12, 14:02 (MOV_0442) | Fixed Roof | Fuel Oil Blend Stock (0.18 psi @ 109F) | 160,000 | 1980 |
| 160-2 | 10/12/12, 14:06 (MOV_0443) | Fixed Roof | Fuel Oil Blend Stock (0.06 psi @ 130F) | 160,000 | 1980 |
| 160-3 | 10/12/12, 14:06 (MOV_0443) | Fixed Roof | Fuel Oil Blend Stock 0.16 psi @ 120F) | 160,000 | 1980 |

Cary Secrest did not identify any concerns based on the IR camera surveys of the two flares and the tanks not identified in the table above. Attachment 10 is a list of all tanks and other emissions sources that I observed during the IR camera/PID surveys, including inspection observations, tank levels that I recorded after observing tank level gauges, times that I conducted the PID surveys, IR camera video and image file names for the IR camera videos and images that Cary Secrest recorded, and other available information about each observed tank. Attachment 11 is the response from ITC Deer Park after the inspection, received October 29, 2012, which includes VOC vapor pressure analysis results and the records for the most recent external and internal IFR tanks inspections (as applicable), for the above noted tanks.

The only notable PID data that I recorded were PID readings downwind from Tanks 80-7 and 80-9 on October 10, 2012 around 16:03. I recorded 15-second average Tiger PID VOC concentrations up to 0.53 ppm as isobutylene and 15-second Tiger Select PID VOC concentrations up to 0.27 ppm as benzene. An IR camera photo taken by Cary Secrest and included as Attachment 7 shows emissions detected in auto mode coming from a vent on the roof of Tank 80-9.

The IR camera imaging by Cary Secrest of IFR Tanks 80-2, 80-7, 80-20 and 80-25 indicates that the tanks' emissions may not be consistent with the limits or permit application representations of Texas Commission of Environmental Quality (TCEQ) Permit 1078, included as Attachment 12. Mike Venegas of ITC Deer Park confirmed during the inspection that the four tanks were not being filled or drawn down and the tank's floating roofs were not landed or in the process of being landed or refloated during the IR camera imaging by Cary Secrest. The following table summarizes the emissions limitations and permit application representations for the four IFR tanks.

| Tanks | VOC Emissions Limit (per tank) | Permit Application Normal Standing Loss Emissions Representations |
|----------------|--------------------------------|--|
| 80-2 | 162.52 lbs/hr | Up to 31 IFR tanks with capacities of 80,000 to 100,000 barrels in ethanol service, resulting in 3.703 lbs/hr of ethanol emissions, or approximately 0.12 lbs/hr for each tank. |
| 80-7 and 80-20 | 162.52 lbs/hr | Up to 8 IFR tanks with capacities of 80,000 to 100,000 barrels in pyrolysis gasoline service, resulting in 5.336 lbs/hr of pyrolysis gasoline emissions, or approximately 0.67 lbs/hr for each tank. |
| 80-25 | 162.52 lbs/hr | Up to 31 IFR tanks with capacities of 80,000 to 100,000 barrels in methanol service, resulting in 5.336 lbs/hr of methanol emissions, or approximately 0.17 lbs/hr for each tank. |

The hourly VOC emissions limitations for these tanks, found in the maximum allowable emissions rate table of Permit 1078, are for tank roof landings and/or working loss emissions of any material authorized for storage in the tanks. The above noted Permit 1078 application emissions representations for normal standing losses were included in permit application materials dated June 4, 2007 (see Attachment 13).

The IR camera imaging by Cary Secrest also indicates that the four IFR tanks may not be adequately inspected or maintained under applicable requirements of 30 TAC, Chapter 115 (all four), 40 CFR Part 60, Subparts A and Kb (Tank 80-25), 40 CFR Part 60, Subparts A and Ka (Tank 80-20), 40 CFR Part 60, Subparts A and K (Tanks 80-2 and 80-7), or 40 CFR Part 63, Subparts A and EEEE (all four). Attachment 11 indicates these four tanks all had recent external seal inspections, no more than two months prior to the date this inspection was conducted. The only issues identified during those external seal inspections were for Tank 80-20 (1/2 inch gap along 12 feet of the secondary seal) and Tank 80-7, which had liquid product accumulated "around the gage well from run off while sampling." No internal seal inspection records for Tanks 80-2, 80-7 and 80-20 were provided and the internal seal inspection record for Tank 80-25 indicated the seals were in compliant condition. Internal API tank inspections records were provided for all four tanks, which all occurred no more than three years prior to the date of this inspection, and numerous deficiencies were noted in the API tank inspection reports.

The IR camera imaging by Cary Secrest of fixed roof tank 60-3 indicates that the tank's emissions may not be consistent with the federally enforceable certified emissions representations of permit by rule (PBR) Registration No. 95093. Mike Venegas of ITC Deer Park

confirmed that the tank was not being filled or drawn down during the IR camera imaging by Cary Secrest. PBR registration representations dated February 21, 2011, for PBR Registration No. 95093, indicate breathing loss from this tank is insignificant and the breathing loss emissions representations were not quantified (see Attachment 14). Attachment 11 indicates the contents of this tank, fuel oil blend stock was sampled for true vapor pressure testing, and the results indicate the true VOC vapor pressure, at 130F, was 0.20 psi, less than 0.5 psi, which is the maximum allowed for fixed roof 60,000 barrel tanks without vent controls.

IR camera imaging by Cary Secrest of fixed roof tanks 80-9, 80-12, 160-1, 160-2 and 160-3 indicates that the tanks' emissions may not be consistent with the VOC limits or permit application representations of Permit 1078. Mike Venegas of ITC Deer Park confirmed that the tanks were not being filled or drawn down during the IR camera imaging by Cary Secrest. The hourly VOC emissions limitation for these tanks (162.51 lbs/hr for 80-9 and 80-12, and 232.15 lbs/hr for 160-1, 160-2 and 160-3) in the maximum allowable emissions rate table of Permit 1078 is for tank working loss VOC emissions of any material authorized for storage in the tank. Permit 1078 application VOC emissions representations dated September 29, 2004 for normal breathing losses from 37 fixed roof tanks in No. 6 fuel oil service is 0.468 lbs/hr, or approximately 0.013 lbs/hr per tank (see Attachment 15). The representations indicate the maximum normal No. 6 fuel oil breathing losses is for a storage scenario that includes 12 fixed roof tanks with an 80,000 to 100,000 barrel capacity in service, and no fixed roof tanks with a 160,000 barrel capacity. Attachment 11 indicates that the true VOC vapor pressures for the materials stored in these fixed roof tanks were less than 0.5 psi, which is the maximum allowed without vent controls for fixed roof tanks with an 80,000 or 160,000 barrel capacity.

Section III - AREAS OF CONCERN

1. Emissions from internal floating roof (IFR) Tanks 80-2, 80-7, 80-20 and 80-25 at Intercontinental Terminals Company LLC, Deer Park Terminal (ITC Deer Park) may exceed the tanks' volatile organic compounds (VOC) emissions limits or permit application representations of Permit 1078. The tanks are subject to inspection and maintenance requirements under 30 TAC, Chapter 115 (all four), 40 CFR Part 60, Subparts A and Kb (Tank 80-25), 40 CFR Part 60, Subparts A and Ka (Tank 80-20), 40 CFR Part 60, Subparts A and K (Tanks 80-2 and 80-7), and 40 CFR Part 63, Subparts A and EEEE (all four).
2. Emissions from fixed roof Tank 60-3 at ITC Deer Park may exceed the federally enforceable certified VOC emissions representations of Permit By Rule (PBR) Registration No. 95093.
3. Emissions from fixed roof Tanks 80-9, 80-12, 160-1, 160-2 and 160-3 at ITC Deer Park may exceed the VOC limits or permit application representations of Permit 1078.

Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – ATTACHMENT LIST

Attachments

1. Tank Inventory List Provided October 10, 2012
2. Site Plot Plans
3. CAA Section 114 Information Request Dated August 24, 2012
4. ITC Deer Park Response to CAA Section 114 Information Request Dated October 4, 2012 and November 1, 2012
5. Dun & Bradstreet Reports and Texas Secretary of State Corporation Information
6. Compact Disk with Video and Image Files, Spreadsheet File with all PID data collected during the inspection (ITC PID Master File 10 10 to 10 12 2012), and a summary spreadsheet file (Summary Log of Data ITC)
7. Photo Log
8. Equipment List
9. PID Calibration Records
10. ITC Deer Park Inspection Master Log of Data and Inspection Observations
11. ITC Deer Park Response to Information Requested During Inspection Dated October 26, 2012
12. TCEQ Permit 1078, Issued January 30, 2012
13. TCEQ Permit 1078 Application IFR Tank Emissions Representations Dated June 4, 2007
14. PBR Registration Representations Dated February 21, 2011, TCEQ PBR Registration No. 95093
15. TCEQ Permit 1078 Application Fixed Roof Tank Emissions Representations Dated September 29, 2004